

STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Broadvox-CLEC, LLC, for Authority  
to Provide Resold and Facilities-Based Local  
Exchange and Interexchange Service

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2009 - 111 - C

(Please type or print)

Submitted by: Sue-Ann G. Shannon

SC Bar Number: 71181

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Other: \_\_\_\_\_

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: \_\_\_\_\_

**INDUSTRY (Check one)**

**NATURE OF ACTION (Check all that apply)**

☐ Electric

☐ Affidavit

☐ Letter

☐ Request

☐ Electric/Gas

☐ Agreement

☐ Memorandum

☐ Request for Certification

☐ Electric/Telecommunications

☐ Answer

☐ Motion

☐ Request for Investigation

☐ Electric/Water

☐ Appellate Review

☐ Objection

☐ Resale Agreement

☐ Electric/Water/Telecom.

☐ Application

☐ Petition

☐ Resale Amendment

☐ Electric/Water/Sewer

☐ Brief

☐ Petition for Reconsideration

☐ Reservation Letter

☐ Gas

☐ Certificate

☐ Petition for Rulemaking

☐ Response

☐ Railroad

☐ Comments

☐ Petition for Rule to Show Cause

☐ Response to Discovery

☐ Sewer

☐ Complaint

☒ Petition to Intervene

☐ Return to Petition

☒ Telecommunications

☐ Consent Order

☐ Petition to Intervene Out of Time

☐ Stipulation

☐ Transportation

☐ Discovery

☐ Prefiled Testimony

☐ Subpoena

☐ Water

☐ Exhibit

☐ Promotion

☐ Tariff

☐ Water/Sewer

☐ Expedited Consideration

☐ Proposed Order

☐ Other:

☐ Administrative Matter

☐ Interconnection Agreement

☐ Protest

☐ Other:

☐ Interconnection Amendment

☐ Publisher's Affidavit

☐ Late-Filed Exhibit

☐ Report

# MCNAIR

ATTORNEYS

Sue-Ann G. Shannon

April 8, 2009

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VIA ELECTRONIC FILING

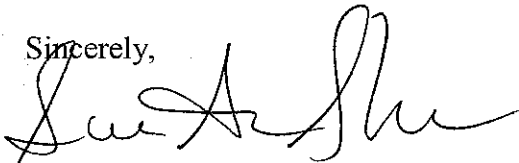
The Honorable Charles L. A. Terreni  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
101 Executive Center Drive, Suite 100  
Post Office Drawer 11649 (29211)  
Columbia, South Carolina 29210

**RE: Application of Broadvox-CLEC, LLC, for Authority to Provide  
Resold and Facilities-Based Local Exchange and Interexchange  
Service  
Docket No. 2009-111-C**

Dear Mr. Terreni:

Enclosed for filing please find a Petition to Intervene on behalf of the South Carolina Telephone Coalition in the above-referenced docket. By copy of this letter and certificate of service, a copy is being served on all parties of record.

Sincerely,



Sue-Ann G. Shannon

SGS:ss

Enclosure

cc: Parties of Record

McNair Law Firm, P. A.  
The Tower at 1301 Gervais  
1301 Gervais Street  
11th Floor  
Columbia, SC 29201

Mailing Address  
Post Office Box 11390  
Columbia, SC 29211

mcnair.net

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2009-111-C

Re: Application of Broadvox-CLEC, LLC, for	)	
Authority to Provide Resold and Facilities-	)	
Based Local Exchange and Interexchange	)	<b>PETITION TO</b>
Service	)	<b>INTERVENE</b>
	)	
<hr/>		

In response to the Commission's Notice of the Filing of the Application of Broadvox-CLEC, LLC, for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:


1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
Margaret M. Fox  
Sue-Ann Gerald Shannon  
McNAIR LAW FIRM, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

By: 

Attorneys for Intervenor South Carolina  
Telephone Coalition

April 8, 2009

Columbia, South Carolina.

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2009-111-C

Re: Application of Broadvox-CLEC, LLC, for )  
Authority to Provide Resold and Facilities- )  
Based Local Exchange and Interexchange )  
Service )  
\_\_\_\_\_ )

**CERTIFICATE OF  
SERVICE**

I, Rebecca Martin, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copy to be deposited with the United States Mail, first class postage prepaid, to:

Scott Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205

C. Lessie Hammonds, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, South Carolina 29211.

  
\_\_\_\_\_  
Rebecca Martin  
McNAIR LAW FIRM, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

April 8, 2009

Columbia, South Carolina.